

10

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 21-cr-20088

v.

Hon. Shalina D. Kumar

JEREMY McCALLUM,

Defendant.

FILED USDC - CLERK DET
2022 MAY 4 PM 12:47

_____ /

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
SEXUAL EXPLOITATION OF CHILDREN
(18 U.S.C. §§ 2251(a) and (d))

In approximately 2002, in the Eastern District of Michigan, the defendant, JEREMY McCALLUM, employed, used, persuaded, induced, enticed, and coerced MV-1, a female born in 1996, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct with Polaroid film, and that visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means,

including by computer, in violation of Title 18, United States Code Sections 2251(a) and (d).

COUNT TWO
SEXUAL EXPLOITATION OF CHILDREN
(18 U.S.C. §§ 2251(a) and (d))

In approximately 2002 to 2003, in the Eastern District of Michigan, the defendant, JEREMY McCALLUM, employed, used, persuaded, induced, enticed, and coerced MV-1, a female born in 1996, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct and storing it on a DVD, and that visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and (d).

COUNT THREE
SEXUAL EXPLOITATION OF CHILDREN
(18 U.S.C. §§ 2251(a) and (e))

In approximately 2007, in the Eastern District of Michigan, the defendant, JEREMY McCALLUM, employed, used, persuaded, induced, enticed, and coerced MV-1, a female born in 1996, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such

conduct and storing it as file name DSCI1023.JPG on a ScanDisk SD card, and that visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FOUR
SEXUAL EXPLOITATION OF CHILDREN
(18 U.S.C. §§ 2251(a) and (e))

In approximately 2007, in the Eastern District of Michigan, the defendant, JEREMY McCALLUM, employed, used, persuaded, induced, enticed, and coerced MV-1, a female born in 1996, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and storing it as file name DSCI1025.JPG on a ScanDisk SD card, and that visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FIVE
SEXUAL EXPLOITATION OF CHILDREN
(18 U.S.C. §§ 2251(a) and (e))

In approximately 2007, in the Eastern District of Michigan, the defendant, JEREMY McCALLUM, employed, used, persuaded, induced, enticed, and coerced MV-1, a female born in 1996, to engage in sexually

explicit conduct for the purpose of producing a visual depiction of such conduct and storing it as file name DSCI1007.JPG on a ScanDisk SD card, and that visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code Sections 2251(a) and (e).

COUNT SIX
SEXUAL EXPLOITATION OF CHILDREN
(18 U.S.C. §§ 2251(a) and (e))

In approximately 2007, in the Eastern District of Michigan, the defendant, JEREMY McCALLUM, employed, used, persuaded, induced, enticed, and coerced MV-1, a female born in 1996, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and storing it as file name DSCI1038.JPG on a ScanDisk SD card, and that visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code Sections 2251(a) and (e).

COUNT SEVEN
SEXUAL EXPLOITATION OF CHILDREN
(18 U.S.C. §§ 2251(a) and (e))

In approximately 2007, in the Eastern District of Michigan, the defendant, JEREMY McCALLUM, employed, used, persuaded, induced,

enticed, and coerced MV-1, a female born in 1996, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and storing it as file name DSCI0975.JPG on a ScanDisk SD card, and that visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT EIGHT
SEXUAL EXPLOITATION OF CHILDREN
(18 U.S.C. §§ 2251(a) and (e))

In approximately 2006 to 2007, in the Eastern District of Michigan, the defendant, JEREMY McCALLUM, employed, used, persuaded, induced, enticed, and coerced MV-1, a female born in 1996, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and storing it on a DVD, and that visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT NINE
SEXUAL EXPLOITATION OF CHILDREN
(18 U.S.C. §§ 2251(a) and (d))

In approximately 2000 to 2001, in the Eastern District of Michigan, the defendant, JEREMY McCALLUM, employed, used, and induced MV-2, a female born in 2000, to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and storing those images on a DVD, and that visual depiction was produced using materials that have been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and (d).

COUNT TEN
SEXUAL EXPLOITATION OF CHILDREN
(18 U.S.C. §§ 2251(a) and (e))

In approximately 2010 to 2011, in the Eastern District of Michigan, the defendant, JEREMY McCALLUM, employed, used, persuaded, induced, enticed, and coerced MV-3, a male born in 2001, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign

commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT ELEVEN
POSSESSION OF CHILD PORNOGRAPHY
(18 U.S.C. § 2252A(a)(5)(B))

On or about February 1, 2020, in the Eastern District of Michigan, the defendant, JEREMY McCALLUM, knowingly possessed material that contained child pornography, as defined in 18 U.S.C. § 2256(8), and the child pornography involved at least one image of a prepubescent minor who had not attained 12 years of age; and the child pornography had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce, including by computer; and which child pornography was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

Upon conviction of the offenses alleged in this Indictment, JEREMY McCALLUM, shall, pursuant to 18 U.S.C. § 2253, forfeit to the United States the following:

- i. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these subsections;
- ii. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- iii. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

If any of the property described in the paragraphs above as being forfeitable pursuant to 18 U.S.C. § 2253, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

the United States of America, pursuant to 21 U.S.C. § 853(p), intends to seek forfeiture of all other property of the defendant up to the value of the above-described forfeitable property.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/Brandy R. McMillion
BRANDY R. McMILLION
Chief, General Crimes Unit
Assistant United States Attorney

s/Christopher W. Rawsthorne
CHRISTOPHER W. RAWSTHORNE
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226-3211
(313) 226-9160
Christopher.Rawsthorne@usdoj.gov

Date: May 4, 2022

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 21-cr-20088
--	----------------------------------	----------------------------

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>CWR</i>

Case Title: USA v. JEREMY McCALLUM

County where offense occurred : Genesee

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.

☐ Indictment/ ☐ Information --- based upon prior complaint [Case number:]

☒ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information


Superseding to Case No: 21-cr-20088 Judge: Hon. Shalina D. Kumar

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☒ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
-----------------------	----------------	--

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 4, 2022
Date


 Christopher Rawsthorne
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: (313) 226-9160
 Fax: (313) 226-2372
 E-Mail address: christopher.rawsthorne@usdoj.gov
 Attorney Bar #: P84401

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.